

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>EUGENIO VARGAS,</b>	§	
	§	
<b>Plaintiff/Counterclaim Defendant,</b>	§	
	§	
<b>v.</b>	§	<b>Civil Action No. 4:22-cv-00430-Y</b>
	§	
<b>ASSOCIATION OF PROFESSIONAL FLIGHT ATTENDANTS, JULIE HEDRICK, AND ERIK HARRIS,</b>	§	
	§	
	§	
<b>Defendants/Counterclaim Plaintiffs.</b>	§	

**UNION DEFENDANTS’ RESPONSE TO PLAINTIFF’S MOTION FOR EXTENSION TO  
RESPOND TO THE UNION DEFENDANTS’ MOTION FOR SUMMARY JUDGEMENT**

The Union Defendants<sup>1</sup> will not file a response in opposition to Plaintiff Vargas' s motion (doc. 47) for extension to respond to the Union Defendants motion for summary judgment (doc. 43), and will leave the grant of the extension, and the length thereof, to the Court's discretion.

Date: October 6, 2022

Respectfully Submitted,

/s/ Sanford R. Denison  
SANFORD R. DENISON  
Tex. Bar No. 05655560  
Baab & Denison, LLP  
6301 Gaston Ave., Suite 550  
Dallas, TX 75214  
Tel.: (214) 637-0750  
Fax.: (214) 637-0730  
Email: denison@baabdenison.com

---

<sup>1</sup> “Union Defendants” shall refer collectively to Defendant/Counterclaim Plaintiff Association of Professional Flight Attendants (“APFA”) and to individual APFA officer Defendants Julie Hedrick and Erik Harris.

WILLIAM W. OSBORNE JR.\*  
D.C. Bar No. 912089  
Osborne Law Offices P.C.  
5335 Wisconsin Avenue N.W., Suite 440  
Washington, D.C. 20015  
Tel.: (202) 243-3200  
Fax: (202) 686-2977  
Email: b.osborne@osbornelaw.com

*Counsel for Defendant Counterclaim Plaintiff  
Association of Professional Flight Attendants, and  
Defendants Julie Hedrick and Erik Harris*

\*Admitted *Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I certify that on this 6th day of October 2022 a true and correct copy of the foregoing document was served on the below listed counsel of record for Plaintiff/Counterclaim Defendant Vargas by a means permitted by Rule 5(b)(2) of the Federal Rules of Civil Procedure ("F.R.C.P.").

KERRI PHILLIPS  
HEATHER ABREU  
K.D. Phillips Law Firm, PLLC  
5700 Tennyson Parkway, Suite 300  
Plano, Texas 75024  
Phone: (972) 327-5800  
Fax: (940) 400-0089  
Email: kerri@KDphillipslaw.com  
Email: Heather@KDphillipslaw.com

/s/ Sanford R. Denison  
SANFORD R. DENISON